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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 PURE PARLAY, LLC a Nevada Limited
14 Liability Company,

15 Case No.: 2:19-cv-00834-GMN-BNW

16 Plaintiff,
17 v.
18 STADIUM TECHNOLOGY GROUP,
19 INC., a Nevada corporation, and GVC
20 HOLDINGS, PLC, a company
21 incorporated in the Isle of Man,

22 **STIPULATION TO AMEND
23 SCHEDULING ORDER**

24 **(FIRST REQUEST)**

25 Defendants.

26 Plaintiff PURE PARLAY, LLC, (“Plaintiff”) and Defendants Stadium Technology
27 Group, Inc., and GVC Holdings, PLC (collectively referred to as “Defendants”), by and through
28 their respective undersigned counsel of record, stipulate and agree to amend the current
Scheduling Order by moving all relevant dates back 120 days.

29 Pursuant to Fed. R. Civ. P. 26(f), LR 26-1, and Local Patent Rules 1-1 et. seq., on
30 October 30, 2019 counsel for the parties conducted a telephonic discovery-planning conference
31 and submitted scheduling dates which are currently set forth in the Scheduling Order signed by
32 the Court. (Dkt. No. 28). However, the parties agree that the dates in the Scheduling Order need
33 to be amended to account for the current status of the case.

34 On February 5, 2020, the Court granted Defendants’ Motion to Dismiss Plaintiff’s first
35 amended complaint providing Plaintiff with leave to file a second amended complaint within 21
36 days. (Dkt. No. 34). On February 24, 2020, Plaintiff filed its second amended complaint. (Dkt.
37

1 No. 37). On February 27, 2020, the parties filed a first stipulation to extend the time for
2 Defendants to file a response to Plaintiff's second amended complaint until March 30, 2020.
3 (Dkt. No. 38). On February 28, 2020, the Court granted the first extension of time. (Dkt. No.
4 39). On March 17, 2020, based on the impact of the COVID-19 virus, the parties filed a second
5 stipulation to extend the time for Defendants to file a response to Plaintiff's second amended
6 complaint until April 17, 2020. (Dkt. No. 41). On March 19, 2020, the Court granted the second
7 extension of time. (Dkt. No. 42).

8 Consequently, as it stands, Defendants have not responded to the second amended
9 complaint and have until April 17, 2020 to do so. The parties agree and propose that the relevant
10 dates in the current Scheduling Order be moved back 120 days, as set forth below, to account for
11 the current status of the case. The new dates also contemplate moving back the Pre-Claim
12 Construction Settlement Conference currently scheduled for March 31, 2020. Three new dates
13 for the Pre-Claim Construction Settlement Conference are proposed herein. The Additional
14 Provisions set forth in the current Scheduling Order to remain unchanged.

Event	New Proposed Deadline
Exchange of Rule 26(a) Initial Disclosures	January 7, 2020 - completed
Joint Protective Order	January 7, 2020 - completed
Disclosure of LPR 1-6 Infringement Contentions and LPR 1-7 Document Production Accompanying Infringement Contentions	May 21, 2020
Disclosure of LPR 1-8 Non-Infringement, Invalidity, and Unenforceability Contentions and LPR 1-9 Document Production Accompanying Non-Infringement, Invalidity, and Unenforceability Contentions	July 6, 2020
Disclosure of LPR 1-10 Response to Non-Infringement, Invalidity, and Unenforceability	July 20, 2020

1	Contentions	
2	Exchange of LPR 1-13 Proposed Terms for Construction	August 17, 2020
3	Exchange of LPR 1-14 Preliminary Claim Constructions and Extrinsic Evidence	September 1, 2020
4	Parties to Submit LPR 1-15 Joint Claim Construction and Prehearing Statement	September 15, 2020
5	Plaintiff to File LPR 1-16 Opening Claim Construction Brief	October 5, 2020
6	Defendant to File LPR 1-16 Responsive Claim Construction Brief	October 26, 2020
7	Plaintiff to File LPR 1-16 Reply Claim Construction Brief	November 3, 2020
8	Deadline to File Motion to Amend Pleadings/Parties	November 10, 2020
9	Claim Construction Tutorials, Hearing, and Order from the Court	TBD by the Court
10	Fact Discovery Cut-off	45 days after entry of Claim Construction Order
11	Opening expert reports on issues for which the serving party has the burden of proof	30 days after close of fact discovery
12	Rebuttal expert reports, on issues for which the other party has the burden of proof	30 days after service of opening expert reports
13	Reply expert reports limited to responses on expert opinions on secondary considerations	15 days after service of rebuttal expert reports
14	Expert Discovery Cut-off	45 days after service of rebuttal expert reports
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1	Dispositive Motion Deadline	30 days after the close of expert discovery
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3 Additionally, the parties propose the following dates for the settlement conferences called
4 for by the Local Rules:

6	Event	Deadline
7	Proposed Dates for Pre-Claim Construction Settlement Conference	April 14, 2020
8		April 21, 2020
9		April 28, 2020
10		
11	Post-Claim Construction Settlement Conference	Within 30 days after entry of claim construction order
12		
13	Pre-Trial Settlement Conference	Within 30 days after filing of pretrial order
14		

15 DATED this 22ND day of March 2020.

17 Respectfully submitted,
18 FISHERBROYLES, LLP

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15 Attorneys for Defendants

16 **IT IS ORDERED** that ECF No. 43 is
17 GRANTED.

18 **IT IS FURTHER ORDERED** that the
19 Pre-Claim Construction Settlement
20 Conference is rescheduled to April 21,
21 2020. The pre-settlement conference
22 call is rescheduled to April 20, 2020 at
23 3:00 p.m. Settlement conference
24 statements must be emailed to
25 chambers per ECF No. 40 by 4:00 p.m.
26 on April 13, 2020.

27 **IT IS SO ORDERED**

28 **DATED: March 23, 2020**

29 

30 **BRENDA WEKSLER**
31 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March 2020, a true and correct copy of the foregoing **STIPULATION TO AMEND SCHEDULING ORDER** was served electronically on all interested parties via the Court's CM/ECF System as follows:

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